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ROCKVILLE, MD 20852

August 14, 2014

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

Re: Connect American Fund Phase II Challenge, WC Docket 14-93  
Peoples Telephone Cooperative, Inc., FCC Form 505

Dear Ms. Dortch:

Peoples Telephone Cooperative, Inc. ("Peoples") attaches for filing the Federal Communications Commission ("Commission" or "FCC") Form 505 ("Form 505") and supporting documentation in the form of a declaration and two map exhibits. This Form 505 and supporting documentation is being filed today electronically via the Commission's ECFS, as well as e-mailed to [Form505@fcc.gov](mailto:Form505@fcc.gov).

Please contact me regarding any questions in this matter.

Respectfully submitted,



Gregory W. Whiteaker  
*Counsel for Atlantic Telecom Multimedia  
Consolidated, LLC*

Enclosures

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Peoples Telephone Cooperative, Inc. Form 505 and supporting documentation, as filed in WC Docket 14-93, was sent on a DVD-R by first-class mail this 14<sup>th</sup> day of August 2014 to:

Jackie Flemming  
AT&T Corp.  
1120 20<sup>th</sup> Street, NW  
Suite 1000  
Washington, DC 20036

Anisa Latif  
AT&T Corp.  
1120 20<sup>th</sup> Street, NW  
Suite 1000  
Washington, DC 20036



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Gregory W. Whiteaker  
Herman & Whiteaker, LLC  
*Counsel for Peoples Telephone Cooperative,  
Inc.*

Connect America Phase II Challenge Process Form  
OMB Control Number 3060-1188  
FCC Form 505

Filing Entity: Peoples Telephone Cooperative, Inc.

FRN (if applicable): 0001678788

Name of Person Filling Out Form: Robin E. Tuttle

Mailing Address of Person Filling Out Form: 3204 Tower Oaks Boulevard, Suite 180, Rockville, MD 20852

Email Address of Person Filling Out Form: [rtuttle@hermanwhiteaker.com](mailto:rtuttle@hermanwhiteaker.com)

Phone Number of Person Filling Out Form: 202-827-0667

Name of Person Certifying Data within Form: Steven Steele

Mailing Address of Person Certifying Data within Form: PO Box 228, 102 N. Stephens St., Quitman, TX 75783

Email Address of Person Certifying Data within Form: [steven.steele@peoplescom.net](mailto:steven.steele@peoplescom.net)

Phone Number of Person Certifying Data within Form: 903-763-2214

|                                    |       |  |                                       |  |   |                                       |                                       |                             |                     |                              |
|------------------------------------|-------|--|---------------------------------------|--|---|---------------------------------------|---------------------------------------|-----------------------------|---------------------|------------------------------|
| Census Block 15<br>Digit FIPS Code | State | Provider Name As Listed in<br>National Broadband Map | Insert X if Speed<br>Criteria Not Met | Insert X if Usage<br>Allowance Criteria<br>Not Met | Insert X if Latency<br>Criteria Not Met | Insert X if Price<br>Criteria Not Met | Insert X if Voice<br>Criteria Not Met | Type of Supporting Evidence | Additional Comments | OMB Control Number 3060-1188 |
|------------------------------------|-------|--|---------------------------------------|--|---|---------------------------------------|---------------------------------------|-----------------------------|---------------------|------------------------------|



Response to Challenge

|                                    |       |  |  |   |  |   |   |   |                             |                     |                              |
|------------------------------------|-------|--|--|---|--|---|---|---|-----------------------------|---------------------|------------------------------|
| Genoss Block 15<br>Digit FIPS Code | State | Name of Entity Making<br>Initial Challenge | FRN of Entity Making<br>Initial Challenge (if<br>provided) | Insert X if Speed<br>Criteria is at Issue | Insert X if Range<br>Allowance Criteria is<br>at Issue | Insert X if Latency<br>Criteria is at Issue | Insert X if Price<br>Criteria is at Issue | Insert X if Voice<br>Criteria is at Issue | Type of Supporting Evidence | Additional Comments | OMB Control Number 3060-1188 |
|------------------------------------|-------|--|--|---|--|---|---|---|-----------------------------|---------------------|------------------------------|

Certifications and Additional Information

OMB Control Number 3060-1188

**Accuracy and Due Diligence Certification**

*All Filers Must Fill Out*

By initialing below, I certify that all statements contained in the attached form are true and accurate to the best of my knowledge, and that I have undertaken due diligence to obtain knowledge regarding these claims.

Certifier's Initials: S.S.

Date: 8/14/14

**Notice of Challenge Certification**

*(Served to Unserved and Unserved to Served Challengers Fill Out One of the Following Blocks - Respondents Do Not Fill Out)*

**Service of Notice Successful**

By initialing below, I certify that notice of this challenge has been served on all interested parties.

Certifier's Initials: S.S.

Date: 8/14/14

**Service of Notice Unsuccessful**

By initialing below I certify that, following a good faith effort, I was unable to serve notice of this challenge on all interested parties due to lack of information regarding the address of such parties.

Name of Party/Parties  
that Could Not Be

Served:

Certifier's Initials:

Date:

The certifications on this page are subject to the penalties for false statements under 18 U.S.C. 1001.

**Declaration of Steven Steele  
In Support of Peoples Telephone Cooperative, Inc. Phase II Challenge**

I, Steven Steele, declare under penalty of perjury that the following is true and correct to the best of my information, knowledge, and belief, as of the date of this declaration. This declaration is submitted in support of Peoples Telephone Cooperative Inc.'s ("Peoples") challenge submitted in the Federal Communications Commission ("Commission" or "FCC") Form 505 to certain census blocks that have been identified as unserved for purposes of Connect America Phase II ("Phase II") support pursuant to the Commission's June 30, 2014 Public Notice<sup>1</sup> announcing the commencement of the Connect America Phase II challenge process.

1. I am General Manager and Chief Executive Officer of Peoples and I have the authority to make this declaration for Peoples.
2. The census blocks identified in the attached Form 505 were listed at the Commission website identified in the Phase II Public Notice.<sup>2</sup> Peoples challenges the eligibility of these census blocks for Phase II support on the basis that they have been incorrectly identified, either wholly as price cap census blocks or as partial census blocks containing eligible locations for Phase II support.
3. Peoples is a rate-of-return regulated provider of telecommunications services in Texas. Certain census blocks in Texas that were included on the FCC's list of census blocks deemed eligible for Phase II support have been identified as wholly or partially within a price cap carrier's service area, but these census blocks either (a) are incorrectly identified as census blocks wholly within a price cap service area as specified herein, or (b) are correctly identified as split census blocks, but are incorrectly identified as eligible for Phase II support because they do not reflect any locations that are served by a price cap carrier so as to be eligible for Phase II support.
4. The following list of census blocks, identified by FIPS codes, which are included in the Form 505, have been incorrectly identified as wholly served by a price cap carrier: 482770002001242, 484499501001070, 484499501001082, 484499503001001, and 484499503001012. Peoples also serves these census blocks and these census blocks should be identified as split between a price cap carrier and a rate-of-return carrier. Portions of these census blocks are included within the Peoples rate-of-return service territory and the FCC's databases should reflect the split service nature of these census blocks.
5. The following list of census blocks, identified by FIPS codes, which are included in the Form 505, have been correctly identified as split census blocks that are within the service areas of both a price cap carrier and a rate-of-return carrier, but there are no locations within the price cap portion of these census blocks so as to make the census blocks eligible for Phase II support:

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<sup>1</sup> *Wireline Competition Bureau Commences Connect America Phase II Challenge Process*, Public Notice, WC Docket Nos. 10-90 and 14-93, DA 14-942 (rel. June 30, 2014) ("Phase II Public Notice").

<sup>2</sup> *Id.*




**Declaration of Steven Steele  
In Support of Peoples Telephone Cooperative, Inc. Phase II Challenge**

482319607001195, 484499501001077, 484499501001078, and 484499501001105. These census blocks are partially served by Peoples and all locations eligible for service are included in the Peoples portion of these census blocks. The FCC's databases should reflect that there are no locations in the price cap portions of these census blocks that would justify including them on the list of census blocks deemed eligible for Phase II support.

6. The Peoples rate-of-return service areas that include the census blocks identified in the Form 505 are identified in the certified service areas that are on file with the Public Utilities Commission of Texas in the attached service area maps, marked as Exhibit A. The split nature of all the census blocks included in the Form 505, as well as service location detail is demonstrated in prints from Google Earth maps, marked as Exhibit B. For maps covering census blocks in paragraph 4, the dark green areas in the marked census blocks are served by the price cap carrier, but the light green areas in those census blocks are served by Peoples. For maps covering the census blocks in paragraph 5, the dark green areas that are enclosed by a lime green line is the price cap portion of the census block and the maps demonstrate that there are no locations within those price cap portions of the census blocks where service could be provided so as to make the census blocks eligible for Phase II support.

7. With the evidence submitted herein Peoples has demonstrated that (a) certain census blocks included in the Form 505 are not wholly served by a price cap carrier, but rather are split between a price cap carrier and a rate-of-return carrier, and the FCC's records should be updated accordingly, and (b) certain split census blocks included in the Form 505 do not contain any service locations in the price cap portion of the census blocks and therefore should not be census blocks that are eligible for Phase II support.

Signed by:   
Steven Steele  
General Manager and Chief Executive Officer  
Peoples Telephone Cooperative, Inc.

Date: August 14, 2014